

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Zurich American Insurance Company

Plaintiff,

vs.

Asphalt Paving Systems, Inc.

Defendant.

Civil Action No.: 1:22-cv-01535-CPO-MJS

Hon. Christine P. O'Hearn

Joint Motion to Enter Agreed Orders

Plaintiff Zurich American Insurance Company and Defendant Asphalt Paving Systems, Inc. hereby jointly move this Court to enter the following attached agreed proposed orders:

1. **Discovery Confidentiality Order.** This proposed order use the form discovery confidentiality order found at Appendix S of the Local Civil Rules, and it is intended to safeguard information entitled to be protected under Rule 26(c)(1)(G) of the Federal Rules of Civil Procedure and Local Civil Rule 5.3.
2. **Agreed Rule 501 Order.** This proposed order follows the form set forth in Local Civil Rule 16.1(b)(2), and it is intended to prevent attorney-client and work product privilege or protection from being waived by disclosure in this litigation.

JOINTLY SUBMITTED BY:

PLAINTIFF	DEFENDANT
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